

Rehab360 Privacy Policy

Last Updated: 31 March 2026

1. Introduction

Sonsoa Technologies Ltd (“we”, “our”, “us”) is committed to protecting and respecting your privacy.

Rehab360 is an AI-assisted rehabilitation and exercise guidance platform designed to support users in performing physical exercises safely. This Privacy Policy explains how we collect, use, store, and protect your personal data when you use our mobile application, web dashboard, and related services (“Services”).

By using Rehab360, you agree to the collection and use of your information in accordance with this policy.

2. Data Controller

Sonsoa Technologies Ltd is the **Data Controller** for the purposes of the UK General Data Protection Regulation (UK GDPR).

Registered Address:

9 Gleneagles Road, Coventry, CV2 3BP, United Kingdom

Contact Email: info@sonsoa.co.uk

3. Information We Collect

We collect and process the following categories of personal data:

3.1 Account Information

- Full name
- Email address
- Age or date of birth (to verify eligibility, including 18+ requirement)
- Login credentials (securely encrypted)

3.2 Health and Biometric Data (Special Category Data)

- Injury history and rehabilitation goals
- Physical measurements (e.g., height, weight, range of motion inputs)
- Exercise performance data
- Motion tracking data (pose estimation derived from camera input)

This data is classified as **special category data under UK GDPR** and is processed only with your explicit consent.

3.3 Camera and Motion Data

- Real-time video feed (processed locally or streamed depending on feature)

- Derived skeletal/keypoint data used for movement analysis

3.4 Usage and Technical Data

- Session frequency and duration
- Interaction with AI feedback features
- Device type, operating system, browser type
- IP address and anonymised analytics identifiers

3.5 Healthcare Provider Data (if applicable)

- Clinician or physiotherapist contact details
- Notes or feedback shared by linked professionals

4. How We Use Your Data

We use your data for the following purposes:

4.1 Service Delivery

- Provide real-time AI-based movement analysis and feedback
- Enable exercise tracking and rehabilitation progress monitoring
- Personalise exercise recommendations

4.2 Communication

- Send service-related updates (e.g., changes to features or policies)
- Respond to support or technical queries

4.3 Improvement and Development

- Improve AI models and system performance using **aggregated and anonymised data**
- Conduct internal research and testing

4.4 Safety and Compliance

- Monitor system performance and detect misuse
- Maintain audit logs for compliance and security purposes

We **do not sell your personal or health data** to third parties.

5. Legal Basis for Processing

Under UK GDPR, we rely on the following lawful bases:

- **Explicit Consent (Article 6(1)(a) & Article 9(2)(a))**
For processing health and biometric data
- **Contractual Necessity (Article 6(1)(b))**
To provide the Rehab360 service

- **Legitimate Interests (Article 6(1)(f))**
For service improvement, analytics, and security (balanced against your rights)

You may withdraw consent at any time via your account settings or by contacting us.

6. Camera and Video Privacy

We prioritise privacy in how camera data is handled:

- **On-Device Processing (Default):**
In most cases, video is processed locally on your device and **not stored or transmitted**
- **Optional Video Storage:**
Video recordings are only stored if you explicitly enable features such as “Video Review”
- **No Facial Recognition:**
Rehab360 uses pose estimation (skeletal tracking) and **does not identify individuals**
- **No Continuous Surveillance:**
Camera access is only active during exercise sessions

7. Data Sharing and Third Parties

We may share data with:

7.1 Service Providers

- Cloud hosting providers (UK/EU-based where possible)
- Analytics and performance monitoring tools
- Technical infrastructure providers

7.2 Healthcare Professionals

- Only when you explicitly link your account or consent to sharing

7.3 Legal Obligations

- Where required by law, regulation, or legal process

All third-party processors are bound by **data protection agreements**.

8. International Data Transfers

Where data is transferred outside the UK:

- We ensure appropriate safeguards (e.g., **Standard Contractual Clauses**)
- Data is protected to UK GDPR standards

9. Data Retention

We retain your data only as long as necessary:

- **Account data:** retained while your account is active
- **Health data:** retained until you delete your account or withdraw consent
- **Analytics data:** anonymised and retained for research purposes

You may request deletion at any time.

10. Your Rights

Under UK GDPR, you have the right to:

- **Access** – obtain a copy of your data
- **Rectification** – correct inaccurate data
- **Erasure (“Right to be Forgotten”)** – delete your data
- **Restriction** – limit how we process your data
- **Portability** – receive your data in a structured format
- **Objection** – object to certain types of processing
- **Withdraw Consent** – at any time for health data

To exercise your rights, contact: info@sonsoa.co.uk

You also have the right to lodge a complaint with the **Information Commissioner’s Office (ICO)**: <https://ico.org.uk>

11. Data Security

We implement strong security measures, including:

- AES-256 encryption for stored data
- TLS 1.2+ encryption for data in transit
- Role-based access controls
- Secure authentication mechanisms
- Regular security testing and monitoring

12. AI Use and Transparency

- Rehab360 uses AI models to analyse movement and provide feedback
- AI outputs are **probabilistic and may not always be accurate**
- Human oversight is applied during development and updates
- The system does not make automated medical diagnoses

13. Medical Disclaimer

Rehab360 is **not a medical device** and does not provide medical advice.

- It is intended for **educational and support purposes only**
- Always consult a qualified healthcare professional before starting or modifying any rehabilitation programme
- Do not rely solely on AI-generated feedback for health decisions

14. Children’s Privacy

Rehab360 is **not intended for individuals under 18 years of age**.

We do not knowingly collect data from minors.

15. Changes to This Policy

We may update this Privacy Policy periodically.

You will be notified of significant changes via the app or email.

16. Contact Us

For questions, concerns, or data requests:

Data Protection Officer

Sonsoa Technologies Ltd

9 Gleneagles Road

Coventry, CV2 3BP

United Kingdom

Email: info@sonsoa.co.uk